

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LISA BROWN, M.D.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-32 E
)	
HAMOT MEDICAL CENTER,)	
)	
Defendant.)	

MOTION TO FILE EXHIBITS UNDER SEAL

1. Defendant Hamot Medical Center (“Hamot”) and plaintiff Lisa Brown (“plaintiff”), together, the “parties,” entered into a Confidentiality Order on July 25, 2005, to protect material entitled to be kept confidential.

2. Pursuant to the Confidentiality Order, parties seeking to file documents under seal must seek prior leave of Court before any documents can be sealed.

3. Hamot seeks to attach to its Reply Memorandum in Support of its Motion for Summary Judgment (Docket # 65) an appendix of exhibits and documents that are subject to the Confidentiality Order.

4. Accordingly, the parties respectfully request that this Court enter an Order sealing the Exhibits to Docket number 65, which have previously been mailed to the Court.

WHEREFORE, Hamot respectfully requests that this Court enter an Order sealing the Exhibits to Docket number 65, Hamot’s Reply Memorandum in Support of its Motion for Summary Judgment.

Respectfully submitted,

Tobin O'Connor Ewing & Richard

/s/ Kerry M. Richard

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